



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
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February 26, 2021

Ms. Liz Roddy
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RE: U.S. EPA (EPA) Concerns Field Change Request (FCR) for Parcel E Phase 2 Transmitted by Navy Email on February 24, 2021

Thank you for sharing FCR 003, Parcel E Phase 2, via email of 2/24/2021 (attached) concerning changes to the Parcel E Sampling and Analysis Plan (SAP) related to radionuclides of concern at IR-03. As the Navy is aware, radionuclides in soil are of particular interest and concern to the HPNS community. Moreover, the SAP is an integral component of the Remedial Action Work Plan. Consequently, the following EPA comments on the revised SAP worksheets in FCR 003 warrant clarification and response.

1. Worksheets 15.2 and 15.11:

According to the "Reason for Change" section of the form, "Sampling for every radionuclide **makes sense for import soil** but not for site characterization or waste samples because the radionuclides of concern (ROCs) have already been established at the site based on sampling for the full suite of possible radionuclides" (emphasis added).

- a. Worksheet #15.2: The "Analyte Group" is listed as "Radionuclides (confirmation sampling)," but should be listed as "Radionuclides (confirmation and waste characterization sampling)." **Revise this worksheet to correct the omission.**
- b. Worksheet #15.11: Cobalt-60, one of the seven ROCs listed in the ROD, has been removed from the analyte list for import soil sampling with no rationale as to its elimination. The latter is inconsistent with the overarching statement to test import soil for all ROCs. **Add Cobalt-60 to the analyte list for import fill or provide an acceptable rationale for its removal and exception.**

2. Worksheets 17.1 and 18:

- a. According to SAP Worksheet #17.1, Section 17.4, “[a] minimum of 10 percent of the samples will be randomly selected for analysis by gas proportional counting for total strontium.” No rationale is provided for either reducing the testing for strontium, or for choosing 10% of the samples. **Revise FCR 003 to include the rationale for the sampling plan for strontium.**
- b. Moreover, Worksheet #18 was not revised to reflect the change in sampling. **Revise Worksheet #18 accordingly.**

3. Worksheet 17.1:

Section 17.5 of the worksheet states, “The backfill will be composed of **clean imported fill** material that has been analyzed to **confirm that the material does not contain site-specific COCs, ROCs, or other contaminants**, based on the nature of the fill source in accordance with the DTSC ‘Information Advisory, for Clean Imported Fill Material’ (DTSC, 2001).” (emphasis added).

At best, this statement is misleading as it indicates that the fill material does not contain contaminants. Rather, based on our knowledge of the Parcel E-2 import soil, the Navy has determined that the import fill material is acceptable for use based on Project Screening Limits, not on the laboratory’s Project Quantitation Limit Goal, the latter which may well detect such COCs ROCs, or other contaminants and render the current statement false.

Revise so as not to inadvertently mislead regulators or the public.

Sincerely,

Karen Ueno

Karen Ueno
EPA Region 9

Attachment

Cc: with Attachment

Mr. Wayne Praskins, EPA Region 9
Mr. Derek Robinson, Navy BRAC PMO West
Ms. Brooks Pauly, Navy BRAC PMO West
Mr. Paul Stoick, Navy BRAC PMO West
Ms. Tina Low, SF Bay RWQCB
Mr. Jeff White, SF Bay RWQCB
Mr. David Tanouye, SF Bay RWQCB
Ms. Nina Bacey, DTSC

Attachment to U.S. EPA Letter of 02/24/2021 Concerning FCR 003, Parcel E Phase 2

From: Roddy, Elizabeth A CIV USN NAVFAC SW SAN CA (USA)
<elizabeth.rodny@navy.mil>
Sent: Wednesday, February 24, 2021 3:51 PM
To: juanita.bacey@dtsc.ca.gov; Ueno, Karen <Ueno.Karen@epa.gov>;
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Cc: Amy.Brownell@sfdph.org; Pauly, Brooks CIV USN BRAC PMO SAN CA (USA)
<brooks.pauly@navy.mil>; Robinson, Derek J CIV USN NAVFAC SW SAN CA (USA)
<derek.j.robinson1@navy.mil>
Subject: Parcel E Phase 2, Hunters Point - Field Change Request

Dear BCT,

The attached Field Change Request (FCR) for Parcel E Phase 2 is provided for your situational awareness. The approved FCR clarifies the radionuclides of concern (ROCs) for waste characterization and post excavation confirmation soil samples to align with the Record of Decision for Parcel E (ROD; Navy, 2013) and Final Historical Radiological Assessment (HRA; NAVSEA, 2004) suite of ROCs for Site IR-03. Replacement Worksheets #15.2 (confirmation sampling), #15.11, and #17.1 have been provided to be used in conjunction with the SAP.

If any questions please let me know.

Very Respectfully,

Liz Roddy

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